

DEFENDANTS' TRIAL EXHIBIT NUMBER	BEGINNING BATES NUMBER	END BATES NUMBER	DATE	DESCRIPTION	DEPOSITION EX. #
1	RS001070			Article	GROVES ; JACKIE; SURFACE; DUFFIN; STOCK; RENDA; WENNER; HENDLEY; GARBER-PAUL; ERDELY; DANA DX6/PX1
2	RS004072	RS004502		Erdely's Reporting File (interview notes)	ERAMO DX134; GARBER-PAUL PX380; ERDELY PX387
3	REDA001334	REDA001334	7/12/2014	Email from Renda to Lampkin re: Media heads up and request*	GROVES DX72
4	REDA000897	REDA000897	7/16/2014	Email from Renda to de Bruyn and McCance, copying Lampkin, re: upcoming RS article*	GROVES DX73
5	UVA010007007	UVA010007008	9/29/2014	Calendar notice for prep session for Sullivan interview*	GROVES DX74
7	UVA020000112	UVA020000115	9/30/2014	Rolling Stone 2014 Drop folder with handwritten notes*	GROVES DX76
8	UVA050000433		10/2/2014	Audio recording of Erdely's interview with Sullivan (made by UVA)	GTROVES DX77
9	RS120613	RS120657	10/2/2014	Transcript of of Erdely's interview with Sullivan (made by UVA)	GROVES DX78
10	RS015046		10/2/2014	Audio recording Erdely's interview with Sullivan (made by Erdely)	GROVES DX79
12	RS016681	RS016681	10/9/2014	Email from de Bruyn to Erdely re: follow-up to interview	GROVES DX81
13	RS013352	RS013360	11/12/2014	Email from de Bruyn to Erdely re: Rolling Stone Fact Checking - On Deadline	GROVES DX82
19	REDA001525	REDA001528	10/14/2014	Email from Burke to Groves, Eramo, Renda re: UVA Magazine Photo Shoot*	GROVES DX91
20	UVA020000332	UVA020000332	9/26/2014	Letter from Groves to Eramo*	GROVES DX92
21	UVA020000331	UVA20000331	8/11/2015	Lette from Groves to Eramo*	GROVES DX93

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DEFENDANTS' TRIAL EXHIBIT NUMBER	BEGINNING BATES NUMBER	END BATES NUMBER	DATE	DESCRIPTION	DEPOSITION EX. #
22A	UVA050000161	UVA050000170	9/1/2015	Text messages between Renda and Eramo*	GROVES DX94
22B			9/1/2015	Text messages between Renda and Eramo (unredacted version provided by UVA)*	
23	ERAMO-06643	ERAMO-06644	2/24/0016	Email notice from Lampkin to sa-all@virginia.edu re: Announcement Regarding Nicole Eramo, Gay Perez, Marsh Pettie*	GROVES DX96
24	RS120722	RS120727	11/9/2012	Anatomy of a Rape Case at the University of Virginia (online version)	GROVES DX98
25A	RS120416	RS120430		True Hoos Fundraiser page*	GROVES DX103
25B				True Hoos Fundraiser page (updated as of October 1, 2016)*	
26	UVA020001755	UVA020001760	4/22/2015	Email from Eramo to de Bruyn re: Final Open Letter w NPE signature.docx*	GROVES DX104
27	ERAMO-04812	ERAMO-04812	4/24/2015	Email from Tom Clare to Pustilnik re: Nicole Eramo / Jackie	GROVES DX105
28	RS120411	RS120412	1/6/2016	An open letter to UVA President Sullivan (NOW)*	GROVES DX106
29	RS120658	RS120676	4/4/2011	Dear Colleague letter (OCR)	DAVIS DX107
30	RS120433	RS120485	4/29/2014	Question and Answer on Title IX and Sexual Violence (OCR)	DAVIS DX108
31	UVA020001406	UVA020001409	11/24/2014	Email from Shofar to Davis re: OCR Review No. 11-11-6001	DAVIS DX109
32	UVA050009988	UVA050010011	9/17/2015	Email from Roberts to Lhamon re: Final - UVA Resolution Agreement.pdf; Attorney Work Product Letter to OCR 09.17.15.pdf, attaching draft agreement and letter*	DAVIS DX112
33	UVA050010012	UVA050010014	9/18/2015	Email from Taylor to Roberts re: OCR Letter to UVA, attaching letter*	DAVIS DX113

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34	UVA050010052	UVA050010078	9/21/2015	Email from Wender to Robers, copying Lhamon, re: Final Letter of Findings, attaching final OCR Letter of Finding (redacted)	DAVIS DX114
35	UVA050009103	UVA050009112	9/21/2015	Unredacted pages from Final OCR Letter of Findings (provided by UVA)	DAVIS DX115
36	UVA050000152	UVA050000153	12/17/2014	Email from Richard Kast to Palma forwarding draft Jackie statement*	GROVES DX42
37	RS120409	RS120410		UVA campus map with fraternities*	GROVES DX46
38	UVA010000167	UVA010000168	10/13/2014	Email from Eramo to Groves and Mintern, copying others, re: fact-checking for UVA magazine	GROVES DX49
39	UVA040001919	UVA040001928	10/27/2014	Email from Mintern to Eramo re: sexual assault feature, attaching draft of UVA magazine story	GROVES DX51
40	UVA050000971	UVA050000972	10/27/2014	Email from Davis to Groves and Lampkin re: sexual assault feature	GROVES DX52
41	UVA050000962	UVA050000970		UVA Magazine draft article with redlines from Groves*	GROVES DX53
42	REDA001273	REDA001274-A1	6/20/2014	Email from Renda to Groves re Advice re: Senate Hearing	GROVES DX56
43	UVA010006187	UVA010006188	9/9/2014	Email from Groves to Eramo and others re: Rolling Stone interview Friday	GROVES DX61
44	UVA010006186	UVA010006186	9/9/2014	Email from Davis to McCance, copying Eramo, Lampkin, and de Bruyn, re: Rolling Stone interview Friday	GROVES DX62
45	UVA040002589	UVA040002589	11/24/2014	Email from Lampkin to Groves re: A Community Letter in Support of Eramo*	GROVES DX63
46	ERAMO-00878	ERAMO-00891	11/24/2014	The Cavalier Daily, Letter: Advocating for Dean Eramo*	GROVES DX64; REDA; JACKIE; WOODS; DANA PX25

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47	UVA020003352	UVA020003352	10/2/2014	Email from Turner to Pattie re: Checking in UVA	GROVES DX66
48	UVA030005474	UVA030005477	10/23/2014	Matt Ferguson Meeting Notes 10-23-14*	GROVES DX67
49	UVA010007063	UVA010007063	11/19/2014	Email from Rivers to Longo, copying Sullivan, Roberts, and others re: Communication from President Sullivan	GROVES DX69
50	RS016665	RS016666	9/11/2014	Email from McCance to Erdely re: Rolling Stone	LAMPKIN DX118
51	UVA040002205	UVA040002214	10/27/2014	Email from Mintern to Lampkin re: sexual assault feature, attaching draft of UVA magazine story	LAMPKIN DX119
52	UVA040002225	UVA040002226	10/27/2014	Email from Davis to Lampkin re: sexual assault feature	LAMPKIN DX120
53	UVA030002263	UVA0300022654		Questions sent by Columbia Journalism Review to UVA****	LAMPKIN DX122
54			1/8/2016	WaPo article: <i>Lawyers for U-Va. Dean: Jackie lied to Rolling Stone about gang rape, 'invented story'*</i>	LAMPKIN DX126
55	UVA050000674	UVA050000677	11/20/2014	Email from Eramo to Meek, Lampkin, and Davis forwarding email from unidentified student to Eramo re: Checking in - Office of the Dean of Students*	LAMPKIN DX128
56A	EXCERPTS OF PINKLETON00201721			Text messages between Jackie, Alex Pinkleton and Sara Surface, excerpt of lines 2745-2755**	
56B	EXCERPTS OF PINKLETON00201721			Text messages between Jackie, Alex Pinkleton and Sara Surface, excerpt of lines 2101-2132**	
56C	EXCERPTS OF PINKLETON00201721			Text messages between Jackie, Alex Pinkleton and Sara Surface, excerpt of lines 2425-2443**	

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56D	EXCERPTS OF PINKLETON00201721			Text messages between Jackie, Alex Pinkleton and Sara Surface, excerpt of lines 18-19**	
57	PINKLETON-01493	PINKLETON-01502	10/30/2014	Email from Pinkleton to Braun re: Meeting Tomorrow	PINKLETON DX15
58	RS018952	RS018953	10/23/2014	Email from Erdely to Pinkleton re: Rolling Stone*	PINKLETON DX17
59	PINKLETON-01378	PINKLETON-01380	11/20/2014	Email from Pinkleton to Braun re: President Sullivan's Holiday Open House	PINKLETON DX19
60A	EXCERPTS OF PINKLETON-00201720			Text messages between Pinkleton and Erdely, excerpt of line 76**	
60B	EXCERPTS OF PINKLETON-00201720			Text messages between Pinkleton and Erdely, excerpt of line 44**	
61	PINKLETON-0021722			Text messages between Pinkleton, Renda, Surface, and Eramo	PINKLETON DX21
61A	EXCERPTS OF PINKLETON-0021722			Text messages between Pinkleton, Renda, Surface, and Eramo, excerpt of line 6**	
61B	EXCERPTS OF PINKLETON-0021722			Text messages between Pinkleton, Renda, Surface, and Eramo, excerpt of lines 8-15	
61C	EXCERPTS OF PINKLETON-0021722			Text messages between Pinkleton, Renda, Surface, and Eramo, excerpt of lines 19-20	
61D	EXCERPTS OF PINKLETON-0021722			Text messages between Pinkleton, Renda, Surface, and Eramo, excerpt of lines 50-52	
62	SURFACE-01122	SURFACE-01125	12/8/2014	Email from Pinkleton to Surface re: The "I believe Jackie letter" draft	PINKLETON DX23
63	PINKLETON-01154	PINKLETON-01155	12/5/2014	Email from Pinkleton to Ashley Brown re: statement by One Less	PINKLETON DX24
64	REDA000069	REDA000069	7/9/2014	Email from Renda to Eramo re: people to contact for Rolling Stone	REDA DX3
65	SURFACE-02942			Text messages between Eramo and Surface*	SURFACE DX11
66	ERAMO-04653	ERAMO-04653	4/18/2015	Email from Lampkin to Clare re: Nicole Eramo*	ERAMO DX95

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67	NA		9/30/2014	2013 UVA Annual Security Report*	ERAMO DX116
68	RS001132	RS001133	5/21/2015	Excerpt of Eramo's Open Letter in Rolling Stone, accompanied by apology*	ERAMO DX132; WOODS; DANA PX31
69	UVA040002871	UVA040002872	11/30/2014	Email from Simon to Hogan and Sullivan re WUVA Media's Reporting on Sexual Assault Policies at UVA*	ERAMO DX135
70	UVA040001916	UVA040001916	10/10/2014	Email from McCance to Eramo re: WUVA Story	ERAMO DX136
71	RS120486	RS120486	9/16/2014	Video of WUVA interview with Dean Eramo	
72	RS016735	RS016736	10/24/2014	Email from Stacy to Erdely re: UVA Student	ERAMO DX141
73	UVA040000470	UVA040000470	5/20/2013	Eramo handwritten notes 5/20/2013	ERAMO DX143
74	REND000001	REND000001	10/24/2013	Email from Eramo to Renda re: Student Info	ERAMO DX144; RENDA PX111
75	UVA040000469	UVA040000469	4/21/2014	Eramo handwritten notes 4/21/2014	ERAMO DX145
76	UVA020001321	UVA020001325	2/25/2015	Email from McCance to Kass re: Response to Your FOIA Request*	ERAMO DX146
77	UVA040005813	UVA040005813	2/25/2015	Email from Pattie to Groves re: Phi Psi support	ERAMO DX147
78	UVA010005180	UVA010005180	10/24/2014	Eramo email to Gore re: Montalto Corp board meeting	ERAMO DX150
79	UVA040002114	UVA040002114	11/6/2014	Email from unidentified student to Eramo re: Follow up on report	ERAMO DX151
80	UVA010005612	UVA010005612	11/4/2014	Email from Davis to Eramo, copying Lampkin, Groves, Casteen, Meek, and de Bruyn re: Lampkin, Davis, Meek, Eramo, de Bruyn	ERAMO DX152
81	UVA010004460	UVA010004461	9/8/2014	Email from Erdely to Eramo re: Rolling Stone	ERAMO DX153
82	RESPJ00000410	RESPJ00000447	09/22-12/13/2014	Text messages between Surface and Jackie	JACKIE PX149
83	RESPJ00000614	RESPJ00000620	10/22/2014	Email from Jackie to Eramo re: Jacqueline [redacted] appointment	JACKIE PX194
84	RS015089	RS015091	8/14/2014	Email from Jackie to Erdely re: Rolling Stone	WENNER PX208

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85	RS016849	RS016850	11/6/2014	Email from Jackie to Erdely re: Pool Cleaning Today	WENNER PX211
86	RS002304	RS002312	11/5/2014	Email from Maltais to Ritter re: UVA Rape Opener sketch-1	PX307
87	RS120233	RS120233	11/19/2014	Email from Likins to Provus re: Sensitive Content*	PX355
88	RS120367	RS120367	12/5/2014	Email from Likins to Ling re: Urgent Request*	PX356
89	RS120236	RS120236	4/23/2015	Email from Simone to Provus re: Update*	PX357
90	RS120234	RS120234	4/29/2015	Email from Andersen to Provus re: Rolling Stone+American Family*	PX358
91	NA		4/13/2016	Rolling Stone's Response and Objections to Interrogatory 1 of Plaintiff's First Set of Interrogatories	PX359
92	RS004779	RS004806		Notes of Erdely's interview with Surface	SURFACE DX7
93A	EXCERPTS OF SURFACE-02939			Text messages between Surface and Jackie, excerpt of lines 304-310**	
93B	EXCERPTS OF SURFACE-02939			Text messages between Surface and Jackie, excerpt of lines 112-123**	
94A	EXCERPTS OF SURFACE-02941			Text messages between Surface and Pinkleton, excerpt of lines 4748-4760**	
94B	EXCERPTS OF SURFACE-02941			Text messages between Surface and Pinkleton, excerpt of lines 744-760**	
94C	EXCERPTS OF SURFACE-02941			Text messages between Surface and Pinkleton, excerpt of lines 314-329**	
94D	EXCERPTS OF SURFACE-02941			Text messages between Surface and Pinkleton, excerpt of lines 3867-3977**	
94E	EXCERPTS OF SURFACE-02941			Text messages between Surface and Pinkleton, excerpt of lines 4236-4243**	
94F	EXCERPTS OF SURFACE-02941			Text messages between Surface and Pinkleton, excerpt of lines 148-206**	
94G	EXCERPTS OF SURFACE-02941			Text messages between Surface and Pinkleton, excerpt of lines 331-336**	

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94H	EXCERPTS OF SURFACE-02941			Text messages between Surface and Pinkleton, excerpt of lines 4582-4590**	
95	UVA040000767	UVA040000784	7/8/2011	2011University of Virginia Policy and Procedures for Student Sexual Misconduct Complaints	
96	REND000027	REND000031	6/20/2014	Email from Renda to Eramo re: So . . . Some good news!	REND 1
97	RS019017	RS019062	10/31/2014	Email from Erdely to Woods re: UVA2*	
98	RS003449	RS003452	11/3/2008	Letter toJohn T. Casteen re: Clery act final determination*	
99	RS018291	RS018292	12/1/2014	Email from Dana to Woods, Erdely, and Bruno re: Edited UVA Statement*	
100	RS018592	RS018594	12/4/2014	Email from Woods to Ganz, copying Erdely, re: no subject, with December 4 "Sabrina Responsds" statement attached	
101	RS007829	RS007832	12/5/2014	Email from Bruno to Shapiro re From Taylor Shapiro/Washington Post*	DANA PX44
102	RS003538	RS003586	2/20/2014	Petition for Writ of Mandamus and Equitable Relief, Jane Doe v. Us HHS (14-0366)	GROVES DX99
103	RS003469	RS003537	2/20/2014	Petition for Writ of Mandamus and Equitable Relief, Jane Doe v. Department OF Education (14-0367)	
104	RS003587	RS003593		Renda Senate Testimony	PX114
105	RS015352	RS015353	8/21/2014	Email from Sandridge to Erdely re: Erdely-Jackie FOIA.docx, attaching FOIA letter from Charlottesville Police Department	
106	RS015312	RS015317	8/16/2014	Email from Jackie to Erdely re: Rolling Stone, attaching photos (photos in native format)	JACKIE; WENNER; ERDELY PX209
107	rs003467	RS003468	11/8/2012	The Anatomy of a Rape Case at the University of Virginia by Anonymous Wahoo (print version)	GROVES DX97

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108	rs017187	rs017188	9/8/2014	Email from Eramo to Erdely re: Rolling Stone	
109			9/11/2014	Audio recording of Erdely's September 11, 2014 interview with Jackie	
110	RS118221	RS118345	9/11/2014	Transcript of Erdely's September 11, 2014 interview with Jackie	ERAMO 131; JACKIE; WENNER, ERDLEY PX218
111			9/12/2014	Audio recording of Erdely's September 12, 2014 interview of Jackie, Pinkleton, and Jackie's boyfriend	
112	RS118346	RS0118440	9/12/2014	Transcript of Erdely's September 12, 2014 interview of Jackie, Pinkleton, and Jackie's boyfriend	JACKIE; ERDLEY PX219
113	RS012301	RS012344	Sep-14	Transcript of Interview with Tommy Reid and Will Cadigan*	
114	RS018282	RS18288	9/15/2014	Email from Jackie to Erdely re: Jacqueline [REDACTED] appointment	JACKIE; ERAMO DX28; WENNER; ERDELY PX370
115	RS018134	RS018134	9/15/2014	Email from Jackie to Erdely re: Articles of Interest*	JACKIE DX28
116	RS017031	RS017042	8/16/2014	Email from Jackie email to Erdely re: Appointment with dean Eramo	JACKIE; ERAMO DX30; JACKIE; WENNER; GARBER-PAUL; ERDELY; WOODS; DANA PX81
117	RS018280	RS018281	9/15/2014	Email from Jackie to Erdely re: Follow-Up	JACKIE DX29
118	RS018811	RS018813	10/2/2014	Email from McCance to Erdely re: Interview with President Sullivan	
119	RS016686	RS016686	10/9/2014	Email from Seccuro to Erdely re: WUVAonline.com	
120	RS016693	RS1016694	10/15/2014	Email from Scipione to Erdely re: Rolling Stone	GARBER-PAUL PX378
121	RS018948	RS018948	10/20/2014	Email from Erdely to Jackie re: Rolling Stone	JACKIE DX34

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122	RESPJ00000677	RESPJ00000677	9/18/2014	Email from Eramo to Jackie re: Checking-In	JACKIE DX35
123	RESPJ00000492	RESPJ00000492	5/14/2013	Email from Lyons to Jackie re: Office of Dean of Students	JACKIE DX37
124	NA		5/3/2014	NY Times.com: <i>Fight against sexual assaults holds colleges to account*</i>	
125	RS014307	RS014333		Text messages between Pinkleton and Erdely	PINKLETIN DX18; JACKIE;WENNER ERDELY PX66
126	RS018958	RS018958	10/24/2014	Email from Erdely to Jackie re: Rolling Stone	
127	RESPJ00000770	RESPJ00000783		Jackie's phone records*	JACKIE DX38
128	RS019113	RS019113	11/3/2014	Email from Erdely to Jackie re: Rolling Stone	
129	RS019649	RS019651	11/6/2014	Email fro Erdely to Garber-Paul re: Federal Tax Form and Direct Deposit	
130	rs019654	RS019658	11/6/2014	Email from Erdely to Garber-Paul, copying Woods, re: Texts bw Jackie & Christine	JACKIE DX40
131	RS019662	RS019666	11/6/2014	Email form Erdely to Garber-Paul, copying Woods, re: Texts bw Jackie & Maddy	JACKIE DX39
132				Text messages between Jackie and Erdely, excerpt of line 38**	
133				Text messages between Jackie and Erdely, excerpt of line 12-16, 56**	
134	RS009617	RS009619	11/25/2014	Email from Bruno to Rosin re: your RS piece*	
135	RS007918	RS007918	11/26/2014	Email from Bruno to Erdely re: Brian Lehrer (WYNC/NPR) interview confirmed for 10am (UPDATE)*	
136	NA		11/27/2014	DoubleX Gabfest: The Butch Goddess Edition: Listen to Slate's show about the campus rape story that shut down UVA's frats (web posting)*	
137			11/26/2014	Audio recording of DoubleX Gabfest: The Butch Goddess Edition	

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138			11/26/2014	Transcript of DoubleX Gabfest: The Butch Goddess Edition	
139	RS119843	RS119852		Erdely's phone records	
140	RS018623	RS018623	12/5/2014	Email from Pinkleton to Erdely re: no subject*	
141	RS018442	RS018442	12/5/2014	Email from Dana to Erdely and Woods re: our worst nightmare	
142	RS120368	RS120369	10/23/14 to 11/19/14	Time sheets for Elisabeth Garber-Paul	
143	RS004810	RS004849		Word Document Fact-Checking Galley	GARBER-APUL; WOODS PX363
144	RS004860	RS004869		Round One Fact-Checking Galley	GARBER-PAUL; WOODS; DANA PX40
145	RS004850	RS004859		Type Final Fact-Checking Galley	GARBER-PAUL; WOODS; DANA; WENNER; HUTCHINSON PX39
146	RS013300	RS013307	11/13/2014	Email from Garber-Paul to Erdely re: Rolling Stone Fact Checking - On Deadline	GROVES; GARBER-PAUL PX282
147	NA		3/25/2003	Jayson Blair, A Nation At War: Families; Watching, and Praying, As A Son's Fate Unfolds, New York Times.*	
148	NA		9/28/1980	Janet Cooke, Jimmy's World, Washington Post*	
149	NA		2/2/2016	Juan Thompson, Retracted: Dylan Roof's Cousin Claims Love Interest Chose Black Man Over Him, The Intercept*	
150	NA		12/14/2014	Jessica Pressler, Because a Stuyvesant Senior Made Millions Picking Stocks. His Hedge Fund Opens as Soon as He Turns. 18, New York Magazine*	

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DEFENDANTS' TRIAL EXHIBIT NUMBER	BEGINNING BATES NUMBER	END BATES NUMBER	DATE	DESCRIPTION	DEPOSITION EX. #
151	NA		9/1/2011	Washington Post Digital Publishing Guidelines on Corrections and Clarifications*	
152	RS007591	RS007593	12/18/2014	Agreement with Columbia Journalism School***	
153	NA		12/5/2014	December 5 Note Standalone (record from December 5, 2014 from Archive.org)  <a href="https://web.archive.org/web/20141205181305/http://www.rollingstone.com/culture/news/a-note-to-our-readers-20141205">https://web.archive.org/web/20141205181305/http://www.rollingstone.com/culture/news/a-note-to-our-readers-20141205</a> [?]	
154	NA		12/7/2014	Article with December 6 Note (record from December 7, 2014 via Archive.org)  <a href="https://web.archive.org/web/20141207030500/http://www.rollingstone.com/culture/features/a-rape-on-campus-20141119">https://web.archive.org/web/20141207030500/http://www.rollingstone.com/culture/features/a-rape-on-campus-20141119</a> [?]	
155	NA		12/7/2014	December 6 Note Standalone (record from December 7, 2014 via Archive.org)  <a href="https://web.archive.org/web/20141207023122/http://www.rollingstone.com/culture/news/a-note-to-our-readers-20141205">https://web.archive.org/web/20141207023122/http://www.rollingstone.com/culture/news/a-note-to-our-readers-20141205</a>	
156	RS001135	RS001135	12/22/2014	Note to Readers regarding CJR investigation in Issue 1226***	WENNER PX32
157	RS007658	RS007658	12/22/2014	Email from Bruno re press re: Rolling Stone: An Update on our Internal Review***	
158	RS001130	RS001131	4/5/2015	A Note to Our Readers re publication of CJR Report***	WENNER; DANA PX30

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DEFENDANTS' TRIAL EXHIBIT NUMBER	BEGINNING BATES NUMBER	END BATES NUMBER	DATE	DESCRIPTION	DEPOSITION EX. #
159	RS005834	RS005835	4/5/2015	Email from Brenner to the press re: Columbia School of Journalism Report and A Note From Managing Editor Will Dana***	
160	UVA040002148	UVA040002153		Eramo CV*	
161	UVA020004175	UVA020004180		2014-2015 Annual Report*	
162	UVA040007990	UVA040007995	11/17/2014	Associate Dean Nicole Eramo Interview*	
163	SURFACE0-2869	SURFACE-02870	9/14/2014	Email from Carol Wood to Catherine Valentine re: Sexual Misconduct Board question	GROVES; ERAMO DX90
164	NA			Plaintiff's Responses and Objections to Defendants' First Set of interrogatories*	
165			12/5/2014	Will Dana tweets*	DANA PX101
166	UVA040001856	UVA040001857	09/11-16/2014	Calendar notice and emails re: Interview inquiry	
167	UVA030008399	UVA030008564		Pepper Hamilton: University of Virginia Timeline	GROVES DX47
168	UVA030008565	UVA030008782		Pepper Hamilton: University of Virginia Exhibits	GROVES DX48
169	UVA040000466	UVA040000467	5/13/2014	Phi Psi Summary	GROVES; ERAMO DX65
170	RESPJ00000679	RESPJ00000680	5/13/2014	Email from Eramo to Jackie re Phi Psi	GROVES; ERAMO; JACKIE DX33
171	respj00001092	respj00001112	09/18-12/10/2014	Jackie texts with Rachel Soltis	JACKIE DX32
172	NA		12/1/2009	publicintegrity.org: <i>Sexual Assaults on Campus shrouded in secrecy</i> *	
173	NA		9/21/2015	OCR Letter of Finding (final) from OCR website.*	
174	RS008905	RS008906	12/5/2014	Email from Dana to Bruno re: Final UVA Statement*	
175	RS016708	RS016722	10/22/2014	Email from Stacy to Erdely re: UVA Student	
176	RS016737	RS016779	10/25/2014	Email from Woods to Erdely re: no subject*	

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177	RESPJ00000233	RESPJ00000233	9/15/2014	Email from Erdely to Jackie re: Articles of Interest*	
178	RESPJ00000245	RESPJ00000251	8/16/2014	Email from Erdely to Jackie re: Appointment with dean Eramo*	JACKIE DX27
179	RS003991	RS003992		List of 78 postsecondary institutions that have pending Title IX sexual violence investigations as of 09, including the dates the specific investigations were initiated.	
180	RS009505	RS009506	11/26/2014	Email from Bruno to Erdely re: Brian Lehrer (WYNC/NPR) interview confirmed for 10am*	
181	RS010372	RS010372	12/5/2014	Email from Dana to Erdely, copying Woods re: our worst nightmare	DANA PX55
182	RS013311	RS013312	11/12/2014	Email from Garber-Paul to Erdely re: Title IX college investigations	
183	RS013456	RS013456	11/10/2014	Email from Woods to Erdely and Garber-Paul re: UVA adds	
184	RS013509	RS013510	11/8/2014	Email from Erdely to Garber-Paul re: round 1	
185	RS013614	RS013614	11/3/2014	Email from Garber Paul to Jackie re: Rolling Stone Fact-Checking.	
186	RS015578	RS015579	11/20/2014	Email from Woods to Erdely re: reported suicide on UVA campus*	
187	RS0016682	RS016683	10/9/2014	Email from de Bruyn to Erdely re: follow-up to interview	
188	RS017091	RS017092	11/12/2014	Email from Garber-Paul to Erdely re: Rolling Stone Fact Checking -- on Short Deadline	
189	RS017181	RS017182	9/6/2014	Email from Eramo to Erdely re: Rolling Stone	
190	RS018653	RS018653	7/29/2014	Email from Jackie to Erdely re: Rolling Stone*	
191	rs018874	RS018920	10/11/2014	Email from Erdely to Woods re: UVA1, attaching copy of draft article*	
192	RS018921	RS018921	10/5/2014	Email from Erdely to Woods re: no subject*	

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193	RS018954	RS018954	10/23/2014	Email from Erdely to Jackie re: Rolling Stone*	
194	RS019642	RS019643	11/5/2014	Email from Erdely to Garber-Paul re: just got off the phone with Jackie*	
195	RS020614	RS020614	12/6/2014	Email from Woods to Ganz re: no subject*	WOODS PX425
196	RS001099	RS001106	4/9/2014	Erdely's Independent Contractor Agreement	WENMNER; ERDELY; DANA PX29
197	UVA0300002283	UVA0300002284	9/16/2014	Email from Erdely to McCance re: UVA stats questions	
198	RS120487	RS120605	9/12/2014	Transcript of audio recording of September 12, 2014 Board of Visitors Meeting*	
199			9/12/2014	Audio recording of September 12, 2014 Board of Visitors Meeting*	
200			9/12/2014	Video of September 12, 2014 Board of Visitors Meeting	
201			11/26/2014	Audio of November 26, 2014 Brian Lehrer Show: WNYC Mishandling-Campus Rape	
202	RS018713	RS018714	9/17/2014	Email from Jackie to Erdely re: Police Alert: Student Reports sexual assault	
203	RS018715	RS018716	9/17/2014	Email from Jackie to Erdely re: Police Alert: City Police Investigating Sexual Assault Reort	
204	RS018717	RS018718	9/17/2014	Email from Jackie to Erdely re: Police Alert: student reports abduction, assault	
205	RS018732	RS018735	8/5/2014	Email from Pinkleton to Erdely re: Personal and Confidential: ANP v. JJC	
206	RS001045	RS001046	11/10/2014	Email from Dana to Hutchinson, Ritter and Maltais re: UVA Dean Spot Sketch-1	RITTER, HUTCHINSON; DANA PX28
207	RS002357	RS002358	11/10/2014	Email from Maltais to Ritter re: UVA Dean spot sketch-1	RITTER; HUTCHINSON PX309
208	RS002365	RS002366	11/10/2014	Email from Ritter to Maltais re: UVA Dean Spot sketch-1	HUTCHINSON PX311

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209	RS003594	RS003990		Erdely's research and press clippings on sexual assault on campuses generally*	
210	RS003993	RS004049		Erdely's research file from Rolling Stone interns*	
211	RS004550	RS004734		Erdely's research and press clippings on sexual assault issues at UVA*	
212	RS013766	RS0013770	11/11/2014	Email from Lecca to Kelsey Grant re: Take Back the Night - photos*	
213	RS014975	RS014980		Erdely notes: Pre-retraction conversation with Jackie, Pinkleton and Surface	WENNER; ERDELY PX530
214	UVA010000339	UVA010000340	11/20/2014	Email from Groves to de Bruyn re: request on UVA investigation of fraternity*	
215	UVA010000584	UVA010000586	11/25/2014	Email from Groves to de Bruyn re: [Meet Dean Groves] Interview request on fraternity commission*	
216	UVA010000600	UVA010000602	11/25/2014	Email from Groves to Tyler Kingkade re: interview request on fraternity commission*	
217	UVA010005175	UVA010005176	9/16/2014	Email from Groves to Eramo re: from Allen Groves at UVA	
218			11/26/2014	Transcript: of November 26, 2014 Brian Lehrer Show: WNYC Mishandling-Campus Rape (TAB 255)	
219			12/5/2014	Article plus December 5 Note (record from December 5, 2014 via Archive.org)  <a href="https://web.archive.org/web/20141205193715/http://www.rollingstone.com/culture/features/a-rape-on-campus-20141119">https://web.archive.org/web/20141205193715/http://www.rollingstone.com/culture/features/a-rape-on-campus-20141119</a>	

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DEFENDANTS' TRIAL EXHIBIT NUMBER	BEGINNING BATES NUMBER	END BATES NUMBER	DATE	DESCRIPTION	DEPOSITION EX. #
220				The Article as it appeared on November 19, 2014 (record from November 19 via Archive.org)  https://web.archive.org/web/20141119200349/http://www.rollingstone.com/culture/features/a-rape-on-campus-20141119	
221	RESPJ00000668	RESP00000670	10/8/2014	Email from Eramo to Jackie re: Referrals	
222				Rollingstone.com: Rape at UVA: Readers Say Jackie Wasn't Alone*	PX559
223	RS020610	RS020611	Spring 2014	Pitch for Article*	WENNER; ERDELY; WOODS; DANA PX89
224	RS015470	RS015470	9/11/2014	Email from Woods o Erdely re:UVA and jackie	WENNER PX 419
225			10/2/2014	Full transcript of October 2, 2014 interview of Theresa Sullivan (Erdely version)	
226	UVA010000612	UVA010000612	11/25/2014	Email from Otani (Bloomberg reporter) to de Bruyn re: question for Bloomberg Businessweek question*	
227	UVA010000623	UVA010000623	11/25/2014	Email from Cuddy to Eramo re: reaction to your interview*	
228	RS120907	RS120907	10/8/2014	WUVA screenshot	
229	RS003394	RS003431	Jan-14	Rape and Sexual Assault: A Renewed Call to Action. The White House Council on Women and Girls*	
230	RS003465	RS003466	11/3/2008	DOE letter to Security On Campus, Knoxville, TN re: complaint SOC filed regarding policies at UVA*	
231	RS004503	RS004549	9/17/2014	Erdely's research and press clippings on Hanna Graham*	

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232			9/21/2015	Email from Wender to Roberts re: Final Letter of Findings, attaching Final Letter of Findings (Composite)	
233				Transcript of WUVA Interview with Eramo (Video at RS120486)	
234	RESPJ00000359	RESPJ00000367	10/15/2014-12/05/2014	Text messages between Jackie and Christine Loureiro*	
235	RESPJ00000395	RESPJ00000398	09/20/2014-12/05/2014	Text messages between Jackie and Jennifer Cifuentes*	
236	RS013885	RS013886	11/3/2014	Email from Jackie to Sacha Lecca re: Rolling Stone photo editor*	
237	RESPJ00000234		9/15/2014	Email from Erdely to Jackie re: Articles of Interest*	
238	PINKLETON-0467	PINKLETON-0468	4/22/2015	Email from Pinkleton to Shapiro re: From Taylor	
239	PINKLETON-01077		12/9/2014	Email from Shapiro to Pinkleton re: 15 min. before deadline - classic	
240	UVA040000434	UVA040000436		Card from Pinkleton to Eramo	
241			12/19/2014	O'Melveny & Myers: University of Virginia, Overview of Title IX and Cleary Act*	
242			12/19/2014	BOV Special Meeting Minutes*	
243			2011	U.S. Department of Education, Handbook for Campus Safety and Security Reporting*	
244			9/11/2015	The Cavalier Daily: UVA first full-time Title IX coordinator*	
245	RS003371	RS003393	Jan. 2007	John D. Foubert, "Behavior Differences Seven Months Later: Effects of a Rape Prevention Program"*	
246	RS013502	RS013503	11/10/2014	Email from Foubert to Garber-Paul re: Rolling Stone Fact Checking - On Deadline	
247	RS016676	RS016679	10/4/2014	Email from Foubert to Erdely re: "Introducing you both!"	

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DEFENDANTS' TRIAL EXHIBIT NUMBER	BEGINNING BATES NUMBER	END BATES NUMBER	DATE	DESCRIPTION	DEPOSITION EX. #
248			8/16/2015	Title IX & VAWA - Executive Summary of Policy Changes fro Students (web archive.org)*	
249	UVA030000339	UVA030000344	3/30/2015	Interim Policy on Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence: UVA Executive Summary of Policy Changes for Students*	
250	UVA030000374	UVA030000413	3/30/2015	UVA Interim Policy on Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence	
251	UVA030000475	UVA030000503	11/19-12/20/2014	UVA Response to Comments on Proposed Changes to SPM*	
252			9/12/2014	BOV '14 Sept. Student Affairs & Athletics Committee (SAA) Minutes*	
253			5/8/2015	Uva Interim Policy on Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence (HRM-041; from webarchives.org)*	
254	UVA050000993	UVA0500010011	9/17/2015	UVA Resolution Agreement re: OCR DKT NO. 11-11-6001*	
255	RS021092		11/18/2014	Email from Scipione to RS-Editors re: University of Virginia Forthcoming Article	
256	RS018937		10/14/2014	Email from Erdely to Scipione re: Rolling Stone	
257	RS120415		11/20/2014	Phi Kappa Psi Press release	
258	RS0120413		12/5/2014	Phi Kappa Psi Press release	
259	UVA0400006816	UVA040006816	10/10/2014	Email from [Redacted] to Turner re: checking in	
260	UVA040006899	UVA040006984	1/15/2015	Email from[Redacted] to Pattie, Groves, et al. re: Phi Psi Chapter Workshop This Saturday 1/17	

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261	UVA020003380	UVA020003381	12/4/2014	Email from Turner to Pattie re: Follow up about the Chronicle	
262	UVA020000327	UVA02000329	Spring 2014	Phi Kappa Psi - Chapter Statement	
263	UVA010005179		10/14/2014	Email from Pattie to Eramo re: Phi Psi Marketing Contact	
264	RS013457	RS013459	11/10/2014	Email fro Carter to Garber-Paul re: Rolling Stone Fact Checking - On Deadline	
265	RS013348	RS013349	11/12/2014	Email from Garber-Paul to Russell re: Rolling Stone Fact Checking - On Short Deadline	
266	RS013530	RS013532	11/7/2014	Email from Garber-Paul to de Bruyn re: Rolling Stone Fact Checking - On Deadline	
267	UVA010000406		11/22/2014	Email from McCance to Groves re: Dani article	
268	RS120366			Social Data metrix for "A Rape on Campus"*	
269	REND000008	REND000010	10/25/2013	Email from Renda to Jackie re: Introduction via Nicole Eramo	PX112
270	ERAMO-05759	ERAMO-06642		Eramo Medical records*, ****	
271	UVA020002577	UVA020002579	12/1/2014	Uva News Release: Uva President Sullivan Meets with Students Regarding Sexual Assault*	
272	UVA010000277	UVA010000278	11/19/2014	Uva News release: Important Message from UVA Pressiden Teresa A Sullivan Addressing Sexual Misconduct*	
273	UVA040010833	UVA040010834	11/12/2014	Email from Eramo to de Bruyn re: Rolling Stone Fact Checking - On Deadline	
274	UVA040010837		11/25/2014	Email from Eramo to de Bruyn re: Request for Assistahce w. press inquiries	
275	UVA040010827	UVA040010829	9/9/2014	Email from Eramo to Lampkin, McCance re: Rolling Stone Interview Friday*	
276	RS015046 (modified)		10/2/2014	Audio recording Erdely's interview with Sullivan (made by Erdely) (typing removed)*	
277			6/30/2016	Sara Surface Declaration*	

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278	UVA010005608	UVA010005609	10/31/2014	Email from Rivers to Davis, Lampkin re: President's Confidential Working papers*	
279				Video: Emily Renda Senate Testimony*	
280	RS015402	RS015406	11/12/2014	Email from Russell to Erdely re: UVAVICTIMSOFFRAPE*	
281	RS019765		11/11/2014	Email from Erdely to Garber-Paul re: fraternity men stat*	
282	RS013418	RS013419	11/12/2014	Email from Garber-Paul to Laura Dunn re: Rolling Stone Fact Checking - On Short Deadline*	
283	RITTER000008	RITTER000053		PX297 for Ritter Designations	RITTER PX297
284	RS001043	RS001044	11/10/2014	PX304 for Ritter Designations	RITTER PX304
285	RS002304	RS002312	11/5/2014	PX307 for Ritter Designations	RITTER PX307
286	RS002360	RS002361	11/10/2014	PX310 for Ritter Designations	RITTER PX310
287	RS002375	RS002377	11/7/2014	PX328 for Ritter Designations	RITTER PX328
288	RS001018		11/4/2014	PX562 for Ritter Designations	RITTER PX562
289			4/5/2016	PX338 for Fine Designations	PX338
290				PX337 for Fine Designations	PX337
291			7/28/2016	washingtonpost.com: Feds open a new sexual violence investigation at U-Va.*	
292			7/27/2016	OCR List of sexual violence investigations at 202 postsecondary institutions*	
293	UVA POLICE 001	UVA POLICE 058		UVA Police Reports	
294			11/26/2014	c-ville.com: UVA activists, author of Rolling Stone article speak*	
295			5/15/2015	UVA Today.com: At Valedictory Exercises, Awards Honor Stalwarts in a Trying Year*	
296			9/21/2015	washingtonpost.com: Dept. of Education: U-Va. Violated federal rules for responding to sexual violence*	
297	UVA020000362-363; UVA040000423-426			Cards and notes of support from BOV*	

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298	UVA010004875; UVA020000398-400; UVA020000397			Cards and notes of support from Wake Forest Univ.*	
299	ERAMO-05573; ERAMO-05574; ERAMO-05575; ERAMO-05571-72; ERAMO-05569-70; ERAMO-05499-05501; ERAMO-05576-78; UVA020000382-383			Collecton of 8 florist cards for flowers*	
300	UVA040001823; UVA010004231; UVA040003362-63; UVA040003358; UVA040004641-42; UVA010005789; UVA010007726; UVA010007733-34; UVA040004644			Collection of nine emails re: negative response to WUVA interview*	

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DEFENDANTS' TRIAL EXHIBIT NUMBER	BEGINNING BATES NUMBER	END BATES NUMBER	DATE	DESCRIPTION	DEPOSITION EX. #
301	UVA010004853; UVA010004854; UVA010004855; UVA010004857; UVA010004858; UVA010004859; UVA010004860; UVA010004862; UVA010004814-15; UVA010004863; UVA010004866; UVA010004867; UVA010004817; UVA010004868; UVA010004869; UVA010004870; UVA010004872; UVA010004873; UVA010004874; UVA010004876; UVA010004877; UVA010004879; UVA010004880; UVA010005723; UVA010004884; UVA010004885; UVA010004887;			Collection of emails in support of Eramo*	

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DEFENDANTS' TRIAL EXHIBIT NUMBER	BEGINNING BATES NUMBER	END BATES NUMBER	DATE	DESCRIPTION	DEPOSITION EX. #
302	UVA020000348-350; ERAMO-05544-05546; UVA020000377; UVA020000404-405; UVA020000358-360; UVA020000352-357; UVA020000372-374; UVA020000375-376; UVA020000351; UVA020000364-367; ERAMO-05502; ERAMO-05555; ERAMO-05554; ERAMO-05592-93; ERAMO-05503; UVA020000401; ERAMO-05567-68; UVA020000371; ERAMO-05584-05586			Collection of handwritten cards, letters to Eramo*	
303	UVA010005254-5255; UVA010006024-6025			Correspondence from Pres. Sullivan to parents, students*	
304	ERAMO-05460	ERAMO-05462	3/7/2014	Correspondence from Pres. Sullivan to Eramo*	
305	ERAMO-05495	ERAMO-05498	11/29/2014	Handwritten card from Marsh Pattie to Eramo*	
306	ERAMO-05540	ERAMO-05508		IRS Form 1040-ES Payment vouchers for Eramo*	
307	ERAMO-05513	ERAMO-05521		Eramo 2014 Tax Returns*	
308	ERAMO-05634	ERAMO-05653	7/2/2015	Client copy of Eramo's Revocable Legal Fund trust*	
309				vanityfair.com: After A Rape Story....What's Next for the University of Virginia*	PX135

\*indicates a document that Defendants may offer if the need arises, pursuant to Rule 26(a)(3)(A)(iii).

\*\*The complete file of text messages will be available in court for review and inspection as necessary.

\*\*\* Offered in the event the Court denies Defendants' motion in limine # 5 to exclude the opinions, conclusions, and findings of the Report of the Columbia School of Journalism.

\*\*\*\* Offered in the event the Court denies Defendants' motion in limine #2 to exclude evidence of Plaintiff's cancer.

DEFENDANTS' TRIAL EXHIBIT NUMBER	BEGINNING BATES NUMBER	END BATES NUMBER	DATE	DESCRIPTION	DEPOSITION EX. #
310	ERAMO-05851; ERAMO-05867-68; ERAMO-06478; ERAMO-5808			Excerpts from Eramo's medical records*, ****	
311	ERAMO-05609; ERAMO-05608; ERAMO-05524-05527; UVA020000403			Handwritten cards and letters to Eramo, post-retraction*	
312	UVA010005744; UVA040003364		Nov-14	Media emails to UVA officialss, seeking information after WUVA interview*	
313				Eramo's LinkedIn page as of 10/02/2016	
314	ERAMO-05352-53; ERAMO-05355; ERAMO-05356			Three emails re: Crowdrise funding and trust account*	
315			5/15/2015	Twitter Algernon Announcement*	
316	UVA010006017		12/8/2014	Email from Groves to Eramo re: SOSA January Working Group*	
317	UVA010006192		11/19/2014	Email from Eramo to Lampkin re: Rolling Stone Article part 1*	
318	UVA010006388		11/24/2014	Email from Lampkin to Wayne Cozart re: UVA fund donation*	
319	UVA020000368	UVA020000370		Handwritten card from Pres. Sullivan to Eramo*	
320	UVA020000384	UVA020000385	11/27/2014	Correspondence from The Seventh Society*	
321	UVA020000392	UVA020000393	7/31/2015	Handwritten note from Craig Littlepage to Eramo*	
322	UVA020000395	UVA020000396		Card from Lynn Bell to Eramo*	
323	UVA020003968		9/9/2015	Email from Katrina Margolis to Eramo re: Hey there just keeping in touch and saying hi!*	
324	RS001132	RS001133	5/21/2015	PX31 for Dana Designations	PX31
325	RS004850	RS004859		PX39 for Dana Designations	PX39
326				PX3 for Wenner Designations	PX3

\*indicates a document that Defendants may offer if the need arises, pursuant to Rule 26(a)(3)(A)(iii).

\*\*The complete file of text messages will be available in court for review and inspection as necessary.

\*\*\* Offered in the event the Court denies Defendants' motion in limine # 5 to exclude the opinions, conclusions, and findings of the Report of the Columbia School of Journalism.

\*\*\*\* Offered in the event the Court denies Defendants' motion in limine #2 to exclude evidence of Plaintiff's cancer.

DEFENDANTS' TRIAL EXHIBIT NUMBER	BEGINNING BATES NUMBER	END BATES NUMBER	DATE	DESCRIPTION	DEPOSITION EX. #
327	RS001130	RS001131	4/5/2015	PX307 for Wenner Designations	PX307
328			12/5/2014	PX86 for Wenner Designations	PX86
329				PX299 for Ritter Designations	PX299
330	ERAMO-04666	ERAMO-04669	4/22/2015	PX460 for Wenner Designations	PX460
331	ERAMO-04541	ERAMO-04563	4/5/2015	Report of the Columbia Journalism School***	PX6

\*indicates a document that Defendants may offer if the need arises, pursuant to Rule 26(a)(3)(A)(iii).

\*\*The complete file of text messages will be available in court for review and inspection as necessary.

\*\*\* Offered in the event the Court denies Defendants' motion in limine # 5 to exclude the opinions, conclusions, and findings of the Report of the Columbia School of Journalism.

\*\*\*\* Offered in the event the Court denies Defendants' motion in limine #2 to exclude evidence of Plaintiff's cancer.